

Tyrese Quinn -- October 20, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION

TYRESE QUINN

PLAINTIFF

VS.

CIVIL ACTION NO. 1:21-CV-00162-SA-DAS

WEBSTER COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

DEPOSITION OF TYRESE QUINN

TAKEN AT THE INSTANCE OF THE DEFENDANTS
ON THURSDAY, OCTOBER 20, 2022,
GORE, KILPATRICK & DAMBRINO, PLLC,
GRENADA, MISSISSIPPI,
BEGINNING AT APPROXIMATELY 9:30 A.M.

(APPEARANCES NOTED HEREIN.)

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EXHIBIT B

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1 A P P E A R A N C E S:

2

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20

21

22 ALSO PRESENT: JACOB EDWARDS

23

24

25

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E X H I B I T S:

(Exhibits retained by counsel.)

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1 TYRESE QUINN,

2 having first been duly sworn, was examined and
3 testified as follows:

4

5 EXAMINATION BY MR. DAMBRINO:

6 Q. State your name for the record please, sir.

7 A. Tyrese Quinn.

8 Q. All right. Mr. Quinn, this is your
9 deposition. Have you ever done a deposition before
10 like this?

11 A. No, sir.

12 Q. Okay. You've brought a lawsuit against the
13 city of Eupora and Webster County and others. And
14 we're going to ask you questions today about the
15 facts that underlie your allegations and a little
16 bit about you. So when I ask you -- I represent
17 Webster County.

18 A. Yes, sir.

19 Q. And I represent Mr. Edwards. So if I ask
20 you a question you don't understand, I'm going to
21 count on you to say, What are you talking about?

22 A. Yes, sir.

23 Q. Because sometimes I do. I mean, lawyers
24 sometimes just garble it up. So I'm going to count
25 on you to make sure I ask you a question you

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1 understand. Okay?

2 A. Yes, sir.

3 Q. If you answer it, I'm going to assume that
4 you do understand it. All right?

5 A. I got you.

6 Q. All right. The -- if I ask you a question
7 that calls for a yes or no answer, if you'll say the
8 word "yes" or the word "no." She's taking down
9 everything we say here. And at the end of the day
10 when we're all done, she's going to go back, and
11 type it all up into a pamphlet -- like a booklet.
12 And it's going to have every single word we said.
13 So if you say -- if you mean to say yes and you go,
14 Uh-huh, that's not going to be as clear the as you
15 want it to be. So if you'll say, Yes or say, No.
16 Okay?

17 A. I got you.

18 Q. All right. If you need to take a break at
19 any time, let me know. We can sure take a break.
20 We got indoor plumbing. We're good to go.

21 A. Yes, sir.

22 Q. Okay. All right. This is being taken
23 pursuant to notice and it's being taken pursuant to
24 Federal Rules of Civil Procedure. That doesn't
25 affect you, but nevertheless we are going to offer

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1 the stipulation that all objections except as to the
2 form of the question are reserved until the time of
3 trial. Is everybody okay with that?

4 MR. MOORE: Yes.

5 MR. WALKER: Yes.

6 BY MR. DAMBRINO:

7 Q. Okay. All right. So we've got your name.
8 Tell me your address, Mr. Quinn -- current address.

9 A. 12 Cade Cove, Ecu, Mississippi.

10 Q. Ecu?

11 A. Yes, sir.

12 Q. Okay. And was that where you were living
13 in August of 2020?

14 A. No, sir.

15 Q. Where did you live then?

16 A. I was living in Eupora, Mississippi.

17 Q. In Eupora?

18 A. Yes, sir.

19 Q. Did you live by yourself or did you live
20 with somebody?

21 A. I lived with my grandmama.

22 Q. Okay. And how old -- what's your birthday?

23 A. January 3rd, 1999.

24 Q. 1999?

25 A. Yes, sir.

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1 Q. Okay. I'm going to ask you -- you're a
2 soft spoken man. And that's admirable. But she's
3 trying to hear what we say. And I'm having -- I'm
4 an ole goat, and I can't hear anyway. So if you
5 don't mind, speak up just a little bit.

6 A. Yes, sir.

7 Q. And that will help everybody out.

8 A. Yes, sir.

9 Q. Thank you. All right. So you were -- that
10 makes you what about, what, 20 now?

11 A. 23 now.

12 Q. What in the world? Well, how old were you
13 in '20?

14 A. I was 21.

15 Q. Oh, that's right. Okay. 21 years old.
16 All right. Now, if I understand correctly -- and
17 I'm going to get into a little background with
18 you -- at the time of this, were you in junior
19 college?

20 A. I had just graduated junior college. I was
21 getting ready to start at Ole Miss.

22 Q. Okay. I'm going to get into that in just a
23 little bit. At the time of the incident, did you
24 live with your grandmother?

25 A. Yes, sir, I did.

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1 Q. Okay. What's her name?

2 A. Pauline Quinn.

3 Q. Pauline Quinn?

4 A. Yes, sir.

5 Q. All right. Anybody else live at the house
6 with y'all?

7 A. My brother, Derek Jones. That's it.

8 Q. How old is Derek?

9 A. He's 27 now.

10 Q. Okay. I'll ask you this -- and I think I
11 know the answer. Were you employed at the time this
12 happened in 2020?

13 A. Yes, sir.

14 Q. Where did you work?

15 A. I forgot his name. It was a -- the dirt
16 bagging company.

17 Q. The dirt bagging company?

18 A. Yeah.

19 Q. Is that in Eupora?

20 A. It's in the country part. I think it's
21 Tomnolen.

22 Q. Tomnolen. Yeah, I know where that is. Are
23 you married?

24 A. No, sir.

25 Q. Have you ever been married?

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1 A. No, sir.

2 Q. Do you have any children?

3 A. No, sir.

4 Q. Okay. I'm going to ask you about your
5 family. And the reason I ask you these questions
6 about your family is not because I'm prying, but
7 it's because, now, when this case is tried, a jury
8 will be selected to try the issues. And it will be
9 selected from around where you live.

10 A. Yes, sir.

11 Q. So I want to make sure that I know if
12 there's a juror on our jury venire that may be
13 related to you, that I'll know it. That's why I'm
14 asking you these questions.

15 A. Yes, sir.

16 Q. So do you have around here -- you've got
17 your grandmother and you've got your brother. Where
18 are your mom and dad?

19 A. My mom is at home, and my dad is --

20 Q. Okay.

21 A. My dad is in Grenada.

22 Q. Okay. And where does your mom live?

23 A. She lives in Ecrú.

24 Q. Okay. And what's your mom's name?

25 A. Angela Fox.

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1 Q. What's your dad's name?

2 A. Dantrell Quinn.

3 Q. Do you have any other adult brothers and
4 sisters besides --

5 A. I do.

6 Q. Who are they?

7 A. Latorius Fox. That's my sister.

8 Q. What's her first name?

9 A. Latorius.

10 Q. Latorius. Okay. Any others?

11 A. Ariel Fox.

12 Q. Ariel Fox. Others?

13 A. Darika Jones.

14 Q. And others?

15 A. That's it for adults.

16 Q. That's it?

17 A. Yes, sir.

18 Q. All right. And where does Latorius live?

19 A. Calhoun City, Mississippi.

20 Q. How about Ariel?

21 A. Tupelo, Mississippi.

22 Q. Darika?

23 A. She lives in Winona.

24 Q. Winona. All right. You were working at
25 the dirt bagging company in Tomnolen at the time of

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1 this incident. And can we agree that this incident
2 occurred on August 8th, 2020?

3 A. It did.

4 Q. Okay. Were you going to school at the same
5 time?

6 A. No, we were starting school later on that
7 month.

8 Q. Okay.

9 A. Like the 20th.

10 Q. Okay. So was that a summer job that you
11 had?

12 A. It was.

13 Q. Okay. All right. And if I remember
14 correctly, your major was general studies in junior
15 college?

16 A. Yes, sir, it was.

17 Q. And then -- I keep calling it junior
18 college. They call it community college now.
19 That's how old I am.

20 So what year were you in 2020 in community
21 college?

22 A. I was a sophomore.

23 Q. Okay. And where were you going to school?

24 A. Itawamba Community College.

25 Q. So you were in your second year?

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1 A. Well, I had already graduated. I was
2 getting ready to enroll at Ole Miss.

3 Q. Oh, okay. I'm a goober. So had you been
4 accepted to Ole Miss?

5 A. Yes, sir.

6 Q. Okay. And did you start Ole Miss?

7 A. I did.

8 Q. Okay. What was your chosen major at that
9 time when you started?

10 A. It was still general studies. I was still
11 trying to decide what I wanted to switch it to.

12 Q. And that was in August of 2020 that you
13 started Ole Miss?

14 A. It was.

15 Q. Okay. And did you graduate from Ole Miss?

16 A. I didn't.

17 Q. Okay. Tell me about your course at Ole
18 Miss. What did you do there? How long did you stay
19 there?

20 A. I stayed there two semesters.

21 Q. Okay. Have you gone to school anywhere
22 else since then?

23 A. No, sir, I haven't.

24 Q. Okay. Did you begin working after that?

25 A. I did.

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1 Q. Where did you start working?

2 A. At Ashley Furniture.

3 Q. Where is that? Which Ashley?

4 A. Verona, Mississippi.

5 Q. Is that the manufacturing place? Or is
6 that a store?

7 A. It's like the manufacturing place like with
8 foam.

9 Q. Okay. What did you do there?

10 A. I just cut foam, throw foam away.

11 Q. Cut foam?

12 A. Yes, sir.

13 Q. You still work there?

14 A. No, sir, I don't.

15 Q. How long did you work at Ashley?

16 A. About two months.

17 Q. Why did you leave Ashley?

18 A. I just didn't want to work there no more.
19 I didn't like the pay and the work conditions.

20 Q. Okay. So you quit there. Did you work
21 anywhere else?

22 A. No, sir.

23 Q. Okay. So as we sit here today, are you
24 employed?

25 A. I'm not.

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1 Q. Okay. So basically -- I'm going to try to
2 get this right. You quit Ole Miss in the spring of
3 2021. Is that right?

4 A. Yes, sir.

5 Q. You went two semesters?

6 A. Yes, sir.

7 Q. And then you went to Ashley Furniture for
8 two months?

9 A. Yes, sir.

10 Q. Which would get you into the summer of
11 2021. And you've not worked since the summer of
12 2021?

13 A. No, sir.

14 Q. Okay. Are you enrolled in any kind of
15 vocational program to learn a trade or anything like
16 that, how to -- electrical stuff?

17 A. No, sir. But I plan on going back to Ole
18 Miss to finish my degree.

19 Q. Good for you. Do I understand that you
20 might have played football at ICC? Is that right?

21 A. Yes, sir, I did.

22 Q. What did you play?

23 A. Corner back.

24 Q. Of course you did. I remember. What did
25 you run? A 4.40 forty? I might have heard that.

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1 A. Something close to that.

2 Q. All right. Where did you go to high
3 school?

4 A. Calhoun City.

5 Q. All right. Prior to this day on August
6 8th, 2020, did you have any criminal history?

7 A. No, sir.

8 Q. Okay. You'd never been arrested and put in
9 jail?

10 A. Never.

11 Q. Okay. Had you been involved in any fights
12 before this day?

13 A. No, sir.

14 Q. Isn't it true that as we sit here today
15 you're still pending a felony charge in Webster
16 County?

17 A. Yes, sir.

18 Q. Okay. What's the status of that?

19 A. I'm not sure.

20 Q. Okay. Who is your attorney in that case?

21 A. (Witness points toward Mr. Moore.)

22 Q. Carlos?

23 A. Yes, sir.

24 Q. Okay. And those felony charges are felony
25 assault on a law enforcement officer. Is that

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1 right?

2 A. Yes, sir.

3 Q. And that arises out of this incident we're
4 here --

5 A. Yes, sir.

6 Q. -- about today?

7 MR. MOORE: Object to the form.

8 BY MR. DAMBRINO:

9 Q. He's going to object from time to time.
10 Unless he instructs you not to answer, you'll need
11 to answer. Is that okay?

12 A. Yes, sir.

13 Q. Okay. Thank you. All right. Prior to
14 August 8th, 2020, you played football at ICC. I
15 assume you're in good health?

16 A. Yes, sir.

17 Q. Did you have any kind of health conditions?

18 A. No, sir.

19 Q. Were you on any medications as of August 8,
20 2020, that were prescribed for you by a doctor?

21 A. No, sir.

22 Q. Okay. Did your have any prior history of
23 depression?

24 A. Maybe at school --

25 Q. Okay.

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1 A. -- some days.

2 Q. Were you on any medication for depression?

3 A. No, sir.

4 Q. Okay. Okay. I'm going to go ahead and get
5 to this issue that we're here on today. Have you
6 ever been -- have you ever had your eye injured
7 before?

8 A. No, sir.

9 Q. Okay. Your allegations of the complaint
10 say that you were assaulted and injured in the
11 Webster County Jail by Jacob Edwards. Is that
12 correct?

13 A. Yes, sir.

14 Q. Okay. In your complaint in paragraph 12,
15 it states that your forehead was thrown against the
16 jail bars. And then in paragraph 26 you say that
17 Edwards? "Jacob Edwards threw your forehead against
18 the jail cell bars." Is that true?

19 A. It is.

20 Q. Okay. And you also say that while in the
21 cell Jacob Edwards removed his vest and began a
22 physical altercation with you -- a fight with you.
23 Is that correct?

24 A. Correct.

25 Q. I know that's what the complaint says. Is

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1 that what you say happened?

2 A. Yes, that's what I say.

3 Q. Okay. And in your complaint in paragraph
4 14 says, "Various officers tased you while you were
5 being attacked by Edwards." Is that correct?

6 A. It is.

7 Q. How many officers tased you?

8 A. I don't remember the exact number. I know
9 it was more than one for sure.

10 Q. More than one?

11 A. (Witness nodding head.)

12 Q. Okay. All right. And you say that after
13 the attack Edwards went back into your cell and
14 mocked your injuries?

15 A. He did.

16 Q. Tell me what he said.

17 A. He told me to hold -- pull my hair back and
18 took out his phone and took a picture I guess.

19 Q. Okay.

20 A. And laughed at it.

21 Q. Okay. Is there anything more to that
22 allegation other than what you just told me?

23 A. No, sir.

24 Q. Okay. You also state in paragraph 16 that
25 eventually an employee of Webster County told

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1 Mr. Edwards to quit attacking you. Is that true?

2 A. To quit attacking me?

3 Q. Yeah, that's the -- that's in the
4 complaint, paragraph 16. Says that --

5 A. Yes, sir, it is.

6 Q. It's true?

7 A. It is.

8 Q. Okay. Do you know who this employee was?

9 A. I don't.

10 Q. Was it a male or female?

11 A. A male.

12 Q. Was he black or white?

13 A. Can't remember.

14 Q. Okay. And on August 8th, 2020, your
15 complaint says, in paragraph 16, you did not get
16 medical attention on that day. Is that true?

17 A. That is true.

18 Q. Okay. The damages you alleged to have
19 occurred to you were left eye trauma, just an injury
20 to your left eye? Is that correct?

21 A. Yes, sir.

22 Q. You've had pain and suffering, emotional
23 distress, and depression. Is that true?

24 A. Yes, sir.

25 Q. Okay. Let me ask you just as a general

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1 question, if somebody hits you in the face, starts
2 swinging at you, you agree you have the right to
3 defend yourself?

4 A. Yes, sir.

5 Q. Okay. Does that apply to law enforcement
6 officers? Do they have the right to defend
7 themselves if somebody attacks them and hits them in
8 the face?

9 A. Yes, sir.

10 Q. Let's talk about the night that you were
11 arrested. You were arrested, I believe, in an area
12 of Eupora that I think is referred to as South Side.
13 Is that correct?

14 A. It is.

15 Q. Okay. Do you remember anything about being
16 arrested?

17 A. I don't.

18 Q. You were pretty drunk, weren't you? Or
19 were you drunk?

20 A. I do remember -- I do remember being on the
21 ground with my head against the tire. That's what I
22 do remember.

23 Q. Okay. Okay.

24 A. That kind of sobered me up.

25 Q. Where had you been that day before --

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1 A. I went to a bar in West Point.

2 Q. What was the name of the bar?

3 A. I don't remember the exact place.

4 Q. Okay. And who was with you?

5 A. My brother Derek Jones and a couple of his
6 friends.

7 Q. A couple of who?

8 A. His friends.

9 Q. Do you remember their names?

10 A. Laregenald Gaston.

11 Q. Say that again for me.

12 A. Laregenald Gaston.

13 Q. What's the last name?

14 A. Gaston.

15 Q. Gaston?

16 A. Yes, sir.

17 Q. And what's the other one?

18 A. Marcus Watson.

19 Q. Marcus Rogers?

20 A. Watson.

21 Q. I can't hear. And how did y'all get to the
22 bar?

23 A. I rode with Laregenald. And the other two
24 guys rode with each other in separate vehicles.

25 Q. Okay. What time did y'all get to the bar?

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1 A. I don't remember the exact time.

2 Q. Do you remember what day of the week it
3 was?

4 A. I don't.

5 Q. Earlier that day, prior to going to the
6 bar, what had you been doing?

7 A. Nothing.

8 Q. Nothing. All right. What kind of
9 substance were you ingesting at -- or prior to the
10 bar or during your time at the bar afterwards? What
11 did you --

12 A. Alcohol.

13 Q. It was alcohol? What were you drinking?
14 Beer? Or was it hard liquor or what?

15 A. It was hard liquor.

16 Q. Okay. Do you remember what you were
17 drinking?

18 A. Patron. That's it. That's all.

19 Q. Were you smoking any pot? Any dope?

20 A. No, sir.

21 Q. No other kinds of drugs or pills, anything
22 like that?

23 A. (Witness shaking head.)

24 Q. But you will admit that you were, in fact,
25 drunk --

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1 A. Yes, I was.

2 Q. -- when you left the bar?

3 A. I was.

4 Q. When you left the bar, I assume you rode
5 with somebody. Who did you ride with?

6 A. Laregenald.

7 Q. Okay. What time did y'all leave the bar?

8 A. I don't remember the exact time.

9 Q. Was Laregenald driving?

10 A. He was.

11 Q. Okay. When you left the bar, where were
12 you headed?

13 A. Home. Back to Eupora.

14 Q. Okay. And tell me what your address was in
15 Eupora again?

16 A. Public drunk.

17 Q. No, what your address was?

18 A. Oh, address?

19 Q. Yeah, where you lived in Eupora?

20 A. I don't know the exact address.

21 Q. What was the name of the street?

22 A. I don't know.

23 Q. You didn't know the name of the street
24 where you lived?

25 A. No, I was just living there. I was just

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1 staying there.

2 Q. Whose house was it?

3 A. My grandma's, Pauline Quinn.

4 Q. But you knew where it was? I mean, you
5 knew where you lived, of course?

6 A. Yes, sir.

7 Q. All right. So you're going back home to
8 Eupora to your grandmother's house, correct?

9 A. That's where I was supposed to go.

10 Q. Okay. Well, where did you actually go?

11 A. He dropped me off at South Side Apartments.

12 Q. South Side Apartments look anything like
13 where your grandmama lived?

14 A. Not at all.

15 Q. Did you know when he dropped you off that
16 you weren't at your grandmother's house?

17 A. I didn't.

18 Q. Okay. So you went in -- what did you do
19 then when he dropped you off? Did he leave or did
20 he stay?

21 A. I don't remember.

22 Q. You don't remember?

23 A. No, sir.

24 Q. Okay. Have you talked to him about any of
25 this since it occurred?

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1 A. No, sir.

2 Q. Where is Laregenald now?

3 A. I'm not sure.

4 Q. Does he work anywhere that you know of?

5 A. I'm not sure.

6 Q. When's the last time you saw him?

7 A. Maybe that day.

8 Q. That's the last time you saw him?

9 A. (Witness nodding head.)

10 Q. So you saw him later that day. Now, that
11 was -- if what I've been looking at is correct, that
12 was around 1:30 that morning.

13 A. I said that was the last day I saw him.

14 Q. Okay. All right. So what did you do when
15 he dropped you off?

16 A. I don't remember.

17 Q. I believe you said earlier the only thing
18 you remember is being on the ground with your head
19 up against the tire of what?

20 A. I guess it was the police car.

21 Q. Okay. You don't remember pounding on the
22 door of a house at 1:41 in the morning?

23 A. I don't.

24 Q. You don't remember calling their
25 inhabitants "weak ass bitches"?

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1 A. I don't.

2 MR. MOORE: I object to this line of
3 questioning. It has nothing to do with what
4 Deputy Edwards did to him in the jail.

5 MR. DAMBRINO: I'm testing his memory of
6 the events leading up to it.

7 BY MR. DAMBRINO:

8 Q. So you got arrested. Do you remember
9 anything about your ride from the house to the jail?

10 A. I don't.

11 Q. So you can't recall any conversations you
12 had with any policemen?

13 A. I can't.

14 Q. Do you remember arriving at the jail?

15 A. I remember walking to the back to the cell.

16 Q. Walking to the back where?

17 A. To the cell.

18 Q. To the cell. So you don't remember being
19 in the booking area?

20 A. I don't.

21 Q. Okay. But you were drunk when you got to
22 the jail. Is that correct?

23 A. Yes, sir.

24 Q. All right. Have you seen a video of what
25 happened in your jail cell at around 2:18 in the

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1 morning?

2 A. I haven't.

3 Q. Okay. That was on August 8th of 2020.

4 MR. MOORE: You say you haven't or have?

5 THE WITNESS: I haven't.

6 BY MR. DAMBRINO:

7 Q. Okay. So do you remember thanking the
8 Eupora Police Department for arresting you?

9 A. No, sir.

10 Q. You don't remember shaking their hands?

11 A. No, sir.

12 Q. Do you remember complaining to one of the
13 officers that he was breathing hard?

14 A. No, sir.

15 Q. Do you remember asking him if it was
16 because you were black?

17 A. No, sir.

18 Q. Okay. Do you remember getting agitated in
19 the booking area and refusing to sit down?

20 A. What does agitated mean?

21 Q. Upset, belligerent --

22 A. No, sir.

23 Q. -- noncompliant?

24 A. I don't.

25 Q. Okay. So you said I guess the first thing

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1 you remember is going back to your jail cell. Is
2 that correct?

3 A. Yes, sir.

4 Q. Say yes or no.

5 A. Yes.

6 Q. Okay. So the -- tell me what you remember.

7 A. I remember as soon as getting back there to
8 my cell -- well, to open the door -- before they
9 open the door I remember my head being pushed
10 against the bars -- held on the bars.

11 Q. Okay. So you said that your head was
12 pushed against the bar?

13 A. It was.

14 Q. Okay. Now, in your complaint you said it
15 was thrown against the bar.

16 A. That's the same thing.

17 Q. That's the same thing to you? You mean the
18 same thing?

19 A. Uh-huh.

20 Q. All right. So -- and you were facing the
21 bars?

22 A. Yes, sir.

23 Q. And the person pushing you was behind you?

24 A. Yes, sir.

25 Q. And how do you know who that person was?

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1 Or do you?

2 A. I don't.

3 Q. You don't know. Okay. You don't know who
4 it was that pushed your head against the bar?

5 A. No, sir.

6 Q. Okay. All right. Then what happened next?

7 A. Then I remember them putting me in there, I
8 guess.

9 Q. Put you in --

10 A. The cell.

11 Q. -- the cell? Okay. Then what happened?

12 A. Then I remember trying to -- well, I was
13 saying something to them. I was trying to -- I was
14 asking them a question or something. Then I
15 remember him shutting it again.

16 Q. Him doing what again?

17 A. Shutting the cell.

18 Q. Shutting the cell? Okay.

19 A. I was trying to ask a question.

20 Q. Okay. And then what happened?

21 A. Then I remember him coming back --
22 aggressively coming back and reopening the cell.

23 Q. Okay. And do you remember the question you
24 were trying to ask him?

25 A. I don't.

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1 Q. Okay. Do you remember anybody else being
2 in the cell when you went in there?

3 A. I don't.

4 Q. You remember him coming back into the cell
5 aggressively. What else do you remember?

6 A. That's it from that part.

7 Q. Say it again.

8 A. That's it from that part. I didn't realize
9 nobody else was in the cell until the next morning.

10 Q. Okay. So when he comes back in the cell,
11 do you remember anything after that point?

12 A. No, sir.

13 Q. Okay. So you don't remember anything after
14 him coming into the cell?

15 A. Except feeling the tasers and feeling the
16 beating.

17 Q. Feeling the tase and feeling the beating?

18 A. Yes, sir.

19 Q. And what was going on? Do you remember
20 what was happening?

21 A. No, sir.

22 Q. Do you remember hitting Deputy Edwards in
23 the face?

24 A. I don't.

25 Q. Do you remember swinging multiple times at

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1 Deputy Edwards?

2 A. I don't.

3 Q. Okay. Do you remember calling him a "weak
4 ass bitch"?

5 A. I don't.

6 Q. Do you remember saying -- and I'm quoting
7 here, I'll fuck you up?

8 A. No.

9 Q. Okay. All right. I think the words you
10 used weren't weak ass, it was "punk ass bitch." Did
11 you say that?

12 A. No.

13 Q. Okay.

14 MR. MOORE: The video will speak for
15 itself.

16 MR. DAMBRINO: Yes, it will.

17 BY MR. DAMBRINO:

18 Q. Can you describe what -- how do you know
19 who attacked you? You say you were attacked. How
20 do you know who that was -- the beating?

21 A. Because I remember the body type.

22 Q. The body type?

23 A. And what he looked like.

24 Q. Okay. So --

25 A. I remember the tattoo on the arm.

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1 Q. Okay. Okay. So you're confident it was
2 Deputy Jacob Edwards that was in your cell hitting
3 you?

4 A. I am.

5 Q. Did he say anything to you that you
6 remember?

7 A. I remember trustees telling me that he
8 said -- he was walking back to the back saying, I'm
9 going to show his little ass something.

10 Q. Okay. Who was that trustee?

11 A. I can't remember.

12 Q. Have you talked to them since the incident?

13 A. No, sir.

14 Q. So you don't know that person as we sit
15 here today?

16 A. I don't.

17 Q. Okay. You don't know where we could find
18 him and talk to him and see if that's what he heard
19 or what?

20 A. No, sir, not that specific one.

21 Q. Okay. All right. And that was -- that
22 statement was attributed to Deputy Edwards?

23 A. Yes, sir.

24 Q. When did the trustee tell you this?

25 A. The next morning.

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1 Q. And that wasn't the person that was in the
2 cell with you, was it?

3 A. No, sir.

4 Q. Do you know the person that was in the cell
5 with you?

6 A. I do.

7 Q. What's his name?

8 A. Dontarius Ashford.

9 Q. Have you seen Dontarius lately?

10 A. No, sir.

11 Q. How do you know him?

12 A. I used to go to school with him at Eupora.

13 Q. Do you know what he was in jail for?

14 A. No, sir.

15 Q. And you have not talked to him since this
16 incident?

17 A. No.

18 Q. Do you know where he is now?

19 A. No, sir.

20 Q. How well do you know Dontarius?

21 A. I don't know him well. I just know him
22 from going to school.

23 Q. Do you know him to be an honest person or
24 trustworthy or anything like that?

25 A. I think he's pretty honest.

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1 Q. Pretty honest. Okay. So after this
2 altercation, do you remember being asked whether you
3 were good?

4 A. No, sir.

5 Q. Okay. You don't then remember responding
6 that, yeah, you were good?

7 A. No, sir.

8 Q. Okay. All right. You don't have any idea
9 what time it was, do you?

10 A. It was like 3:00, 4:00 in the morning.

11 Q. If I told you it was 2:18 in the morning on
12 August 8th, 2020, would you have reason to disagree
13 with me? Or do you know?

14 A. I don't know the exact time.

15 Q. Okay. And after that you pretty much went
16 to sleep?

17 A. I just remember waking up.

18 Q. Okay.

19 A. I don't even remember going to sleep.

20 Q. Okay. So you woke up the next morning,
21 correct?

22 A. Yes.

23 Q. So you don't remember, and you -- as far as
24 you know, you did not ask for medical attention
25 right after the altercation, did you?

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1 A. I did.

2 Q. You did?

3 A. I did.

4 Q. Okay. This was before they left your cell
5 that night?

6 A. No.

7 Q. It was the next morning that you asked for
8 it?

9 A. Yes.

10 Q. Is that correct?

11 A. Yes.

12 Q. And I'm going to say it was around 9:30. A
13 female Eupora police officer perhaps?

14 A. Yes.

15 Q. You know who I'm talking about?

16 A. Yes, sir.

17 Q. Okay. And you told her that you needed
18 medical attention?

19 A. Yes.

20 Q. Now, you said you didn't get any. But
21 isn't it true that that very morning, within an
22 hour, they took you to the emergency room?

23 A. No, it wasn't within the hour.

24 Q. Okay. So when was it? Tell me when it
25 was.

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1 A. It was about -- took about two to three
2 hours after I woke up.

3 Q. Okay. Now, do you remember what time you
4 woke up?

5 A. I don't.

6 Q. Okay. Will you agree that you were taken
7 to the emergency room in Eupora by a sheriff's
8 deputy and a Eupora police officer at 10:30 the next
9 morning?

10 A. That's true.

11 Q. Yeah. Do you remember telling the police
12 officer, as you were going to the hospital, that you
13 do not remember what happened to you the night
14 before?

15 A. As far as being arrested?

16 Q. No. She -- I think you told her you didn't
17 remember what happened to you the night before but
18 somebody told you you got beat up. Do you remember
19 saying that to her?

20 A. I do.

21 Q. So the truth is you didn't remember what
22 happened to you that night?

23 MR. MOORE: Object to the form of the
24 question.

25 BY MR. DAMBRINO:

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1 Q. Is that the truth? You didn't remember --

2 MR. MOORE: Same objection.

3 BY MR. DAMBRINO:

4 Q. -- what happened to you that night? You
5 still have to answer unless he tells you not to.

6 A. Yeah.

7 Q. Your answer is what?

8 A. Yeah.

9 Q. Yeah what?

10 A. I do remember telling her.

11 Q. You do remember telling her that?

12 A. Yeah.

13 Q. Okay. But you don't -- you do not remember
14 what happened that night. Is that correct?

15 A. Yes. Yeah.

16 Q. Okay. Do you remember being examined by
17 Dr. Billy Chandler and other healthcare
18 professionals?

19 A. Yes.

20 Q. Okay. You were given, I think, eye drops
21 and some salve for a scrape on your side?

22 A. And my forehead.

23 Q. And your forehead. Okay. Now, after that
24 time -- I think that morning you might have been
25 served with citations for public drunk and

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1 disorderly conduct. Is that correct?

2 A. Yes, sir.

3 Q. And what was the disposition of those
4 charges? You pled guilty to them or what happened
5 to them?

6 A. I pled guilty to public drunk.

7 Q. Public drunk?

8 A. Yes, sir.

9 Q. What, did they pass the other to the file?
10 Or what happened? The disorderly conduct, you pled
11 guilty to that too?

12 A. Yes, sir.

13 Q. Okay. So you also got served with the
14 felony charges of assaulting a law enforcement
15 officer, didn't you?

16 A. Yes, sir.

17 Q. And you bonded out?

18 A. Yes, sir.

19 Q. Okay. Did you leave -- when did you leave
20 the jail? Was that later that day?

21 A. Yes, sir.

22 Q. Okay. Since that day, since you left the
23 jail, we know that you eventually went to Ole Miss
24 for two semesters?

25 A. Yes, sir.

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1 Q. And then the rest of what we talked about
2 earlier.

3 A. Yes, sir.

4 Q. You filed this complaint on October the
5 26th of 2021. I will tell you that that's the date
6 stamped on your complaint that was filed in this
7 case lawsuit.

8 A. Yes, sir.

9 Q. At any time between the day you left the
10 hospital -- the day you left the jail and the filing
11 of your complaint, did you seek any further medical
12 attention?

13 A. Yes, sir.

14 Q. From whom and when?

15 A. The eye doctor in Eupora, Mississippi. I
16 don't remember the specific dates. And for
17 headaches.

18 Q. You went to a doctor for headaches?

19 A. Yes, sir.

20 Q. Which doctor did you go to?

21 A. I went to a doctor in Calhoun City.

22 Q. Do you know his or her name?

23 A. I don't.

24 Q. Do you know the name of the clinic?

25 A. No, sir. It's only one clinic in Calhoun

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1 City.

2 Q. Well, they had a hospital there. What do
3 they call it? Heritage or something. Did you go to
4 the hospital there or did you go to a doctor's
5 clinic?

6 A. I went to a doctor's clinic.

7 Q. Okay. Is that your regular family practice
8 doctor or you just --

9 A. I just went.

10 Q. Okay. The only records we can obtain -- or
11 have been able to obtain from your eye doctor show
12 that your visit to them occurred on December 21st of
13 2021. That's the first visit we've got to an eye
14 doctor. Is that correct, that the first time you
15 went to the eye doctor was in December of last year?

16 A. I also went in 2020.

17 Q. Okay. To who? The same doctor?

18 A. Yes, sir, Eupora.

19 Q. Okay. What did that doctor tell you when
20 you went to see him in 2020?

21 A. I don't remember.

22 Q. You can see okay through your left eye,
23 correct?

24 A. It goes in and out sometimes.

25 Q. Do you wear glasses?

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1 A. No, sir.

2 Q. The eye doctor didn't prescribe glasses for
3 you?

4 A. He didn't. Just eye drops.

5 Q. Okay. And you said it goes in and out.
6 Describe that for me.

7 A. Like some days it's clear. Then some days
8 it get real blurry.

9 Q. Blurry? Kind of out of focus?

10 A. Yes, sir.

11 Q. Okay.

12 A. And it throbs a lot sometimes.

13 Q. Your eye throbs?

14 A. Yeah.

15 Q. How many times have you gone to the eye
16 doctor for your eye?

17 A. About two -- two or three times.

18 Q. Two or three times. I know of one. And
19 that's in December of 2021.

20 A. Yes, sir.

21 Q. And you say you went in to 2020 to the same
22 doctor, correct?

23 A. (Witness nodding head.)

24 Q. And have you been since -- any other time
25 besides 2020 and December 21st of 2021?

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1 A. I haven't.

2 Q. So you've gone twice. Is that right?

3 A. Two to three times.

4 Q. Two to three times. Same doctor every
5 time?

6 A. Yes, sir.

7 Q. Okay. All right. So correct me if I'm
8 wrong. I know you will. The allegation that you
9 were denied medical treatment by the Webster County
10 Sheriff's Department is not true, is it?

11 MR. MOORE: Object to the form of the
12 question.

13 BY MR. DAMBRINO:

14 Q. You may answer.

15 A. I was denied medical attention.

16 Q. We just talked about your going to the
17 emergency room.

18 A. I'm saying the night of it. I didn't
19 receive medical attention until the next morning.

20 Q. Okay. And that's --

21 A. Therefore I laid there all night in pain.

22 Q. And your testimony is -- your sworn
23 testimony is that that night you asked to see a
24 doctor. That's what you're telling me under oath?

25 A. I did.

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1 Q. Okay. And you deny, under oath, that you
2 swung at and hit Deputy Edwards in his face?

3 A. If I did, I don't remember.

4 Q. Okay. And --

5 A. Or it was out of fear of him coming back
6 into the cell.

7 Q. Okay. Do you deny that you threw the first
8 blow in this altercation -- in hitting him in the
9 face?

10 A. I wouldn't.

11 Q. You wouldn't what?

12 A. I wouldn't deny it.

13 Q. Okay. So you're saying that -- if I make a
14 statement to you, you threw the first blow in this
15 altercation, would you agree or disagree?

16 MR. MOORE: Object to the form. The
17 video speaks for itself.

18 BY MR. DAMBRINO:

19 Q. It does. I'm asking you what you know.

20 THE WITNESS: Do I have to answer that?

21 MR. MOORE: If you know. If you don't,
22 you don't have to.

23 A. I don't know.

24 Q. You don't know whether you threw the first
25 blow or not, and the video would tell us, wouldn't

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1 it?

2 A. It would.

3 Q. Yeah. Okay. Did you ever know Deputy
4 Edwards before this night?

5 A. I didn't.

6 Q. Okay. That's the first time you ever met
7 him?

8 A. Yes, sir.

9 Q. Okay. Have you seen him since that night?

10 A. No, sir.

11 Q. Okay. Have you seen anybody from the
12 Webster County Sheriff's Department or Webster
13 County Police Department since that night and talked
14 to them about this accident?

15 A. No, sir.

16 Q. Has anyone called you and told you they saw
17 the incident?

18 A. No, sir.

19 Q. Are you currently under a doctor's care for
20 any injuries you complain of in your complaint?

21 A. I'm not.

22 Q. Are you currently on any medication for any
23 pain or emotional distress or anything else arising
24 out of this incident?

25 A. I got to take Tylenol a lot for my

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1 headaches.

2 Q. Have you been arrested since this incident?

3 A. No, sir.

4 Q. Have you been drunk since this incident?

5 A. No, sir.

6 MR. MOORE: Robert, you saying you don't
7 have the 8/10/2020 visit?

8 MR. DAMBRINO: Huh-uh.

9 MR. MOORE: (Tenders document.)

10 MR. DAMBRINO: Mind if I get a copy of
11 it?

12 MR. MOORE: No.

13 MR. DAMBRINO: Thank you. Thank you.

14 Let's take a break. Off the record.

15

16 (A short break was taken.)

17

18 BY MR. DAMBRINO:

19 Q. All right. Back on the record. Mr. Quinn,
20 your attorney has handed me a set of documents from
21 the eye clinic of Eupora that indicates that on
22 August 10th of 2020, you went in to see them as you
23 said.

24 A. Yes, sir.

25 Q. And they examined your eye. And based on

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1 what I read here, you tell him, historically, that
2 you got hit in your eye by a police officer. And he
3 says your eye is swollen, bruised, and has a
4 hemorrhage.

5 Okay. And I believe he diagnosed you as
6 having a conjunctival hemorrhage left eye and ocular
7 laceration without prolapse or loss of intraocular
8 TI. If you know what that is, let me know. I don't
9 know what all of that means?

10 A. I'm not sure.

11 Q. But, basically, he asked you to come back
12 in a week or as needed if your vision changed.
13 That's what this says. And you've told me today
14 that you've gone two or three times to him. I know
15 one of them was basically a year and four months
16 after this. You went after the lawsuit was filed
17 December 21st. Did you go any time in between
18 there? Or do you remember?

19 A. I don't remember.

20 Q. Okay. When's the last time you went to see
21 him?

22 A. It would be the 2021 date.

23 Q. Okay. That was the last time you saw him?

24 A. Yes, sir.

25 Q. Okay. So is it fair to say then that you

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1 did not need to go back and see him before then?

2 A. Not until later.

3 MR. DAMBRINO: Okay. All right. I'm
4 going to go ahead and mark this August 10th
5 package that Mr. Moore has given to me as
6 Exhibit 1 to this deposition.

7 (Exhibit 1 marked for identification and
8 attached hereto.)

9 BY MR. DAMBRINO:

10 Q. Okay. Let's go back on the record. And I
11 need to correct myself. I was looking at that
12 record the entire time. And the date I'm referring
13 to, December 21st is the date of your medical
14 authorization. That's on the front of that record.
15 So I have to go back now and ask you. Did you -- I
16 don't have --

17 MR. DAMBRINO: Is there another record
18 from this doctor besides the August 10th one?

19 MR. MOORE: That's the only one I have.

20 BY MR. DAMBRINO:

21 Q. Okay. Well, then since what I was talking
22 about earlier, a December 21st date, you weren't
23 examined that date. That's the date you signed your
24 medical authorization. But it's your testimony that
25 you've been back to this doctor since August 10th --

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1 A. Yeah, I have.

2 Q. -- of '20? Okay. All right. But we just
3 don't have the records for it.

4 MR. MOORE: Because I requested the
5 record on December the 2nd, 2021. When did
6 you say he went?

7 MR. DAMBRINO: He said -- well, I was
8 saying December 21st. But that was the date
9 of his -- this is what I'm looking at,
10 Carlos. See the front page says 12/2/21.

11 MR. MOORE: Okay. And they printed it
12 on 12/6/21. But it's for the exam date
13 8/10/2020.

14 MR. DAMBRINO: So all we have records
15 for is 8/10/22?

16 MR. MOORE: (Witness nodding head.)

17 MR. DAMBRINO: Okay. We'll get that
18 again. That's Exhibit 1.

19 All right. I think I'm through with
20 you. But, now, Mr. Walker has the right to
21 ask you questions too, that fellow down
22 there. He represents the City of Eupora.

23 THE WITNESS: Yes, sir.

24 MR. DAMBRINO: So thank you for your
25 time --

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1 THE WITNESS: Yes, sir.

2 MR. DAMBRINO: -- and your answers.

3 And I'll tender the witness, Mr. Walker.

4 MR. WALKER: Thank you. Just off the
5 record for a second.

6 (Off the record.)

7 BY MR. DAMBRINO:

8 Q. Mr. Walker has indicated he subpoenaed
9 those records from your eye doctor. And the other
10 records he obtained was August 10th of 2020, which
11 indicates that that's the only time you went to see
12 that doctor. Is that true?

13 A. It is not.

14 Q. So what you're saying, that you went after
15 August 10th of 2020, correct?

16 A. Yes, sir.

17 Q. And --

18 A. I got a refill on my eye drop.

19 Q. Okay. So that's why you went, was to get a
20 refill on your eye drops?

21 A. Yes, sir.

22 Q. Did the doctor examine you?

23 A. I don't -- he did the first time.

24 Q. Right. But the second time you don't
25 remember? As we sit here today, do you remember

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1 being examined by this eye doctor on any other
2 occasion other than this first August 10th, 2020,
3 occasion.

4 A. No, sir.

5 MR. DAMBRINO: Okay. With that I tender
6 the witness. Thank you.

7

8 EXAMINATION BY MR. WALKER:

9 Q. Good morning, Tyrese. I know I'm kind of
10 sitting across the -- if you can't hear me, just let
11 me know. Or if you need me to rephrase or repeat a
12 question, that's fine. Just stop me and I'll repeat
13 it.

14 Again, my name is Loden Walker. I'm the
15 attorney that represents the municipal defendants,
16 which is the City of Eupora and Chief Hunter in this
17 lawsuit. I just have a couple of questions. I
18 think Rob hit on most of the things I was going to
19 ask.

20 But just sticking with my outline, this
21 lawsuit stems from your arrest by the Eupora Police
22 Department for disorderly conduct and public
23 drunkenness on August 8th, 2020. Is that right?

24 A. Yes, sir.

25 Q. Okay. And after you were arrested, those

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1 officers transported you to the Webster County Jail,
2 correct?

3 A. Yes, sir.

4 Q. Okay. So this lawsuit, it has to do with
5 what occurred at the jail, right?

6 A. Right.

7 Q. Not with the arrest. Okay. Your complaint
8 says that you're suing the City of Eupora and Chief
9 Hunter in his official capacity. Is that right?

10 A. Yes, sir.

11 Q. Okay. Tell me why you sued the City of
12 Eupora.

13 A. Because what happened inside the cell and
14 the treatment after what happened.

15 Q. Okay. Did you sue the city just because
16 that's where the individual police officers worked?

17 A. No, because of the situation.

18 Q. And what do you mean by that?

19 A. What went down in the cell and not getting
20 medical treatment and the picture taken. Not
21 because of that place.

22 Q. Is there any other reason?

23 A. No, sir.

24 MR. MOORE: Object to the form.

25 Q. Okay.

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1 MR. MOORE: Calls for a legal
2 conclusion.

3 BY MR. WALKER:

4 Q. Are you aware of any written policies of
5 the City of Eupora regarding law enforcement
6 officers?

7 A. No, sir.

8 Q. Are you aware of any other instances of
9 excessive force by any officers of the City of
10 Eupora?

11 A. Could you explain?

12 Q. Incidents similar to yours?

13 A. Oh. No, sir.

14 Q. You're also suing the city for negligent
15 training, supervision, and retention of their
16 officers. How do you believe that the city did not
17 properly train, supervise, or retain their officers?

18 A. Because the trustee told me that one of
19 them took their body cam off, the vest.

20 Q. What was the -- sorry. Go ahead.

21 A. And also when we called to complain to the
22 sheriff, he was -- he was disrespectful.

23 Q. Okay. So just to be clear, there's a chief
24 of police, who's Greg Hunter. And there's a
25 sheriff. Those are two different entities. Okay.

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1 And I handle the city. Okay. Rob is with the
2 county.

3 A. Okay. Okay.

4 Q. Just the sheriff.

5 A. Okay.

6 Q. Do you know anything about the training of
7 Eupora -- the City of Eupora police officers?

8 A. I don't.

9 Q. Okay. You're also suing the city and Chief
10 Hunter for failure to intervene. What do you mean
11 by that? Why are you suing for failure to
12 intervene?

13 A. Failure to stop what went on.

14 Q. Is there something -- what do you wish the
15 police officers would have done?

16 A. Kept us separated.

17 Q. Okay.

18 A. And stopped them from reentering the cell.

19 Q. Did the police officers attempt to keep you
20 separated?

21 A. No, sir.

22 Q. Okay. Okay. And it was established
23 earlier that at some point you got in a fight with a
24 sheriff's deputy. Is that right?

25 A. Yes, sir.

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1 Q. And you said you remembered the police
2 officers pulling the tasers out?

3 A. I remember feeling the taser.

4 Q. Did any of the officers tase you?

5 A. Yes, sir, more than one.

6 Q. Okay. Where at?

7 A. On my side. On both sides.

8 Q. Okay. How many times were you tased?

9 A. I'll say one by each. Each of them.

10 Q. So in total, how many is that?

11 A. Two.

12 Q. After the incident, did you see any police
13 officers with the City of Eupora?

14 A. No, sir.

15 Q. And we established that after the incident
16 that morning you were taken to Eupora Medical for
17 treatment?

18 A. I was.

19 Q. What injuries resulted from the tase or the
20 two tases?

21 A. I had two -- I had two cuts on this side
22 and a cut on this side.

23 Q. Is there anything else?

24 A. No, sir.

25 Q. What damages are you seeking from the city?

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1 MR. MOORE: Object to the form of the
2 question.

3 A. What damages? What damages am I seeking?

4 BY MR. WALKER:

5 Q. Yes.

6 A. Could you break that down to me?

7 Q. Sure.

8 A. What type of relief are you asking for from
9 the city?

10 THE WITNESS: I don't understand what
11 he's asking.

12 MR. MOORE: You can say that to him out
13 loud. He said he doesn't understand what
14 you're asking.

15 MR. WALKER: I understand.

16 BY MR. WALKER:

17 Q. Are you asking for money damages?

18 A. Oh. Yes, sir.

19 Q. Okay. What about emotional distress
20 damages?

21 A. I need that too.

22 Q. Okay. What kind of emotional distress did
23 you feel as a result of the two tases?

24 A. When I'm around polices, I get anxiety. I
25 get nervous.

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1 Q. Is there anything else?

2 A. Headaches.

3 Q. That resulted from the two tases?

4 A. Yes, sir.

5 Q. Okay. Have you seen any doctors or medical
6 professionals?

7 A. I went to the doctor one time about my
8 headaches.

9 Q. Okay. Did he prescribe you anything?

10 A. No, sir. I just take Tylenol.

11 Q. Okay. What was the name of that doctor?

12 A. I don't know.

13 MR. WALKER: Okay. No further
14 questions.

15

16 FURTHER EXAMINATION BY MR. DAMBRINO:

17 Q. I need to ask you something. I had asked
18 you when I was -- it's in response to something you
19 told him. I had asked you whether you talked to
20 anybody at the sheriff's department since this
21 happened, and you said, No.

22 A. Right.

23 Q. But you told him that -- We talked to the
24 sheriff after this, and he was disrespectful.

25 A. No, that's when my mom called. This is the

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1 same day I got bailed out. My mom called the
2 sheriff.

3 Q. Okay. So she called the --

4 A. Me, personally, I didn't. I had -- this is
5 all the same --

6 Q. Did you hear what the sheriff said?

7 A. No, sir. But she told me.

8 Q. What did she tell you?

9 A. She told me that he was like -- she was
10 trying to tell him what went on, and he was like,
11 Well, ma'am, I don't work on those days. So I don't
12 have anything to do with it. And he was like, Who
13 said we're going to court about this? I don't
14 remember specifically everything that was said.

15 Q. But she told you he was disrespectful?

16 A. Yes, sir.

17 Q. That's your mama?

18 A. Yes.

19 Q. Okay. Do you know the name of the sheriff
20 she spoke with?

21 A. I don't. Whoever the sheriff was at the
22 time.

23 Q. I didn't ask you this, but is the deputy
24 who assaulted you sitting in this room?

25 A. Yes, sir.

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1 Q. And that's Mr. -- right here?

2 A. Yes, sir.

3 Q. Sitting next to me? My client, Jacob
4 Edwards?

5 A. Yes.

6 MR. DAMBRINO: Okay. That's all I've
7 got.

8 MR. MOORE: I'll reserve my questions
9 for trial.

10

11 (Deposition concluded at approximately
12 10:40 a.m.)

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1 CERTIFICATE OF DEPONENT

2 I, TYRESE QUINN, deponent in this
 3 deposition, hereby certify that I have examined the
 4 foregoing pages and find them to contain a full,
 5 true, and accurate transcription of the testimony as
 6 given by me on October 20, 2022, in Grenada,
 7 Mississippi.

8 Page Line Correction (If Any)

9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____

15 This the _____ day of _____, 2022.

16

17

18 _____ (WITNESS)

19 State of Mississippi, County of _____

20 Sworn to and subscribed before me, this the _____

21 day of _____, 2022.

22

23

24 _____ NOTARY PUBLIC

25 MY COMMISSION EXPIRES _____

CERTIFICATE OF COURT REPORTER

I, Desi W. Arnold, Court Reporter and Notary Public in and for the County of Pontotoc, State of Mississippi, do hereby certify that the foregoing pages, and including this page, contain a true and accurate transcription of the testimony, as taken by me in the aforementioned matter at the time and place heretofore stated by stenotype and later reduced to typewritten form under my supervision by means of computer-aided transcription.

I further certify that under the authority vested in me by the State of Mississippi that the witness was placed under oath by me to truthfully answer all questions in this matter.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, in the final outcome of this proceeding.

Witness my signature and seal this the 8th day of NOVEMBER, 2022.



Desi Arnold

DESI W. ARNOLD, BCR, CCR 1738

My Commission Expires: June 1, 2025